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*Attorneys for the RKS Claimants*

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re:  
  
PG&E CORPORATION,  
  
- and -  
  
PACIFIC GAS AND ELECTRIC  
COMPANY,  
  
Debtors.  
  
Affects PG&E Corporation  
  
Affects Pacific Gas and Electric Company  
☒ Affects both Debtors  
  
*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Case No. 19-30088 (DM) (Lead Case)  
(Jointly Administered)

Chapter 11

**DECLARATION OF FRANK T.M.  
CATALINA IN SUPPORT OF THE RKS  
CLAIMANTS' MOTION TO ENFORCE  
THE ADR PROCEDURES ORDER AND  
ESTABLISH A MARCH 20, 2023  
DEADLINE TO OBJECT TO RKS  
CLAIMANTS' CLAIMS**

**Hearing Information:**

Date: March 7, 2023  
Time: 10:00 a.m. (Pacific Time)  
Place: (Telephone or Video Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

Pursuant to 28 U.S.C. § 1746, I, Frank T.M. Catalina, under penalty of perjury, hereby declare as follows:

1. I am Counsel at the law firm Rolnick Kramer Sadighi LLP (“**RKS**” or “**Claimants’ Counsel**”), counsel to the claimants listed on Schedule A to the Motion (collectively, the “**RKS Claimants**”). I submit this declaration in further support of the RKS Claimants’ Motion to Enforce the ADR Procedures Order and Establish a March 20, 2023 deadline to object to the RKS Claimants’ Claims (the “**Motion**”).<sup>1</sup>

2. On January 19, 2023, I attended the mediation (the “**Mediation**”) with Reorganized Debtors on behalf of the RKS Claimants.

3. Prior to the Mediation Reorganized Debtors never indicated that they expected each of the 699 RKS Claimants to attend the Mediation.

4. Prior to the mediation, RKS provided Reorganized Debtors with its damages model for the RKS Claimants’ damages, and the parties exchanged lengthy mediation statements.

5. The mediation was terminated because Reorganized Debtors refused to accept RKS’s representation that it was authorized to negotiate on behalf of the RKS Claimants, rendering any further negotiations impossible.

6. At no time that I am aware of have Reorganized Debtors requested individual demands from the RKS Claimants.

7. Attached hereto as **Exhibit 1** is a true and correct copy of the Notice of Intent to Stay Action Pending Conclusion of Bankruptcy Proceedings, dated April 29, 2021, and filed by the court in the action *In re PG&E Securities Litigation*, No. 5:18-cv-03509-EJD (N.D. Cal.) (the “**Class Action**”).

8. Attached hereto as **Exhibit 2** is a true and correct copy of PG&E Corporation’s Response to Lead Plaintiffs’ Objection to the Court’s Notice of Intent to Stay, dated June 10, 2021, and filed in the Class Action.

9. Attached hereto as **Exhibit 3** is a true and correct copy of the Order Staying Action

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<sup>1</sup> Capitalized terms that are not defined herein have the same meaning as in the Motion.

1 Pending Resolution of Chapter 11 Bankruptcy, dated September 30, 2022, entered by the court in  
2 the Class Action.

3 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
4 and correct.

5 Executed on February 28, 2023.

6 By:



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